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UNITED STATES OF AMERICA,

v.

DANNY DURAN,

Plaintiff,

EDWIN OSVALDO MANRIQUEZ and

Defendants.

CR 2:25-cr-00582-AH

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy to Commit Assault on Federal Officer and Depredation of Government Property; 18 U.S.C. § 111(a)(1), (b): Assault on Federal Officer by Deadly or Dangerous Weapon; 18 U.S.C. § 1361: Depredation of Government Property (Class A Misdemeanor)]

COUNT ONE

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2025 Grand Jury

[ALL DEFENDANTS]

[18 U.S.C. § 371]

Α. OBJECTS OF THE CONSPIRACY

The Grand Jury charges:

Beginning on a date unknown to the Grand Jury, and continuing until on or about June 9, 2025, in Los Angeles County, within the Central District of California, defendants EDWIN OSVALDO

MANRIQUEZ ("MANRIQUEZ") and DANNY DURAN ("DURAN"), did knowingly and

intentionally conspire with one another and with others known and unknown to the Grand Jury to commit the following offenses:

- a. Assault on a Federal Officer by deadly or dangerous
 weapon, in violation of Title 18, United States Code, Section 111(a),
 (b); and
- b. Depredation of Government Property, in violation of Title 18, United States Code, Section 1361.

B. MANNER AND MEANS OF THE CONSPIRACY

- 2. The objects of the conspiracy were carried out, and were to be carried out, in substance, as follows:
- a. Defendants MANRIQUEZ and DURAN would enter a vehicle that belonged to defendant DURAN with a paintball gun and facial coverings.
- b. Defendants MANRIQUEZ and DURAN would gather with members of the public at a site where law enforcement officers were known to be responding to an Immigration and Customs Enforcement ("ICE") protest.
- c. Defendants MANRIQUEZ and DURAN would use defendant DURAN's vehicle to: (1) drive near law enforcement officers present at the scene of the protest, (2) point and fire the paintball gun at law enforcement officers present at the scene of the protest as well as federal property, and (3) drive away from the scene of the protest.

C. OVERT ACTS

3. On or about the following dates, in furtherance of the conspiracy and to accomplish its objects, defendants MANRIQUEZ and DURAN, and others known and unknown to the Grand Jury, committed

various overt acts within the Central District of California, and elsewhere, including, but not limited to, the following:

Overt Act No. 1: On June 8, 2025, defendant DURAN texted Individual 1, stating, "I got my paintball gun to shoot ice. They doing takeovers and protesting. I recommend bringing a mask."

Overt Act No. 2: On June 9, 2025, defendants MANRIQUEZ and DURAN, and others known and unknown to the Grand Jury, went with a paintball gun and protective face coverings to an address on North Los Angeles Street in a white Infinity car belonging to defendant DURAN, where law enforcement officer E.S., and others, were gathered to respond to protesters gathered in the area for an ICE protest.

Overt Act No. 3: On June 9, 2025, defendant MANRIQUEZ extended the paintball gun out of the passenger window of the white Infinity while it was driven by defendant DURAN.

Overt Act No. 4: On June 9, 2025, defendant MANRIQUEZ pulled the trigger multiple times, dispersing multiple rounds of paintballs on law enforcement officer E.S., and others, as well as a federal building on North Los Angeles Street.



Overt Act No. 5: On June 9, 2025, defendant DURAN made a Uturn on North Los Angeles Street, turned onto Temple Street, and drove away to a parking garage in downtown Los Angeles.

COUNT TWO

[ALL DEFENDANTS]

[18 U.S.C. $\S\S$ 111(a)(1), (b), 2(a)]

On or about June 9, 2025, in Los Angeles County, within the Central District of California, defendants EDWIN OSVALDO MANRIQUEZ and DANNY DURAN, each aiding the other and others known and unknown to the Grand Jury, intentionally and forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with victim E.S., an employee of the Federal Protective Service, and in doing so made physical contact with E.S., while E.S. was engaged in, and on account of, the performance of E.S.'s official duties, and in doing so used a deadly and dangerous weapon, namely, a paintball gun.

COUNT THREE 1 2 [ALL DEFENDANTS] 3 [18 U.S.C. § 1361] [CLASS A MISDEMEANOR] 4 On or about June 9, 2025, in Los Angeles County, within the 5 6 Central District of California, defendants EDWIN OSVALDO MANRIQUEZ 7 and DANNY DURAN, each aiding the other and others known and unknown 8 to the Grand Jury, willfully injured and committed a depredation 9 against property of the United States, namely, the walls of the 10 Federal Building located at 300 North Los Angeles Street in Los 11 Angeles, California. 12 13 A TRUE BILL 14 15 /s/ Foreperson 16 17 BILAL A. ESSAYLI United States Attorney 18 CHRISTINA T. SHAY 19 Assistant United States Attorney Chief, Criminal Division 20 21 22 FRANCES S. LEWIS Assistant United States Attorney 23 Chief, General Crimes Section 24 SHAWN T. ANDREWS Assistant United States Attorney 25 Deputy Chief, General Crimes Section 26 NISHA CHANDRAN Assistant United States Attorney 27 Major Frauds Section

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